

Hearing Date: August 11, 2020 at 10:00 a.m. (ET)
Objection Deadline: August 4, 2020 at 4:00 p.m. (ET)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
Old Carco LLC, <i>et al.</i> ,	:	Case No. 09-50002 (SMB)
	:	
Debtors.	:	Jointly Administered
	:	
	:	

**NOTICE OF FRANKIE OVERTON'S MOTION FOR RELIEF FROM
THE COURT'S "ENFORCEMENT ORDER" TO PERMIT HER TO
PURSUE AN INDEPENDENT CLAIM AGAINST FCA US LLC**

PLEASE TAKE NOTICE that Frankie Overton ("**Overton**"), as executor of the estate of Sue Ann Graham, by and through her undersigned counsel, hereby files *Frankie Overton's Motion for Relief From the Court's "Enforcement Order" to Permit Her to Pursue an Independent Claim Against FCA US LLC* (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held before the Honorable Judge Stuart M. Bernstein, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 723, New York, New York 10004 (the "**Bankruptcy Court**"), on **August 11, 2020 at 10:00 a.m. (Prevailing Eastern Time)** (the "**Hearing**"), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that that response or objections, if any, to the relief sought in the Motion must be made in writing and (a) filed with the Bankruptcy Court no later than **4:00 p.m. (Prevailing Eastern Time) on August 4, 2020** (the "**Objection Deadline**") and (b) served so as to be actually received by the movant by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served, movant may submit to Court a final order substantially in the form attached to the Motion, which final order may be entered with no further notice or opportunity to be heard.

Dated: July 23, 2020
New York, New York

COLE SCHOTZ P.C.

By: /s/ Mark Tsukerman
Mark Tsukerman
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Tel: (212) 752-8000

*Bankruptcy Counsel for Plaintiff
Frankie Overton, as Executor of the
Estate of Sue Ann Graham*

and

**BEASLEY, ALLEN, CROW,
METHVIN PORTIS & MILES, P.C.**
J. Parker Miller (pro hac vice)
Stephanie Monsplaisir (pro hac vice)
P.O. Box 4160
Montgomery, Alabama 36103-4160
Tel: (334) 269-2343

*Lead Counsel for Plaintiff Frankie
Overton, as Executor of the Estate of Sue
Ann Graham*